

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: :
:
KARL DALRYMPLE, : CHAPTER 13
:
Debtor : BKRTCY. NO. 19-11584 pmm

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

Karl Dalrymple, by and through his counsel, Kevin K. Kercher, Esquire, has filed a Motion to Modify Plan Post-Confirmation. Debtor's mortgagee has obtained stay relief and proposed a modification which Debtor has accepted. This will be performed outside of Bankruptcy. Debtor no longer needs a 60 month plan. In addition, Debtor's expenses have increased and his income decreased. Debtor is eligible for a Discharge after March, 2022 by performing under a modified, 36-month plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, If you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **March 30, 2022** you or your attorney must do all of the following:

- (a) file an answer explaining your position at

**Clerk, U.S. Bankruptcy Court
The Gateway
201 Penn St., Suite 103
Reading, PA 19601**

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the movant's attorney:

**LAW OFFICES OF KEVIN K. KERCHER, ESQUIRE, P.C.
Kevin K. Kercher, Esquire
881 Third Street, Suite #C-2
Whitehall, PA 18052
(610) 264-4120 phone
(610) 264-2990 fax**

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the **Honorable Patricia M. Mayer on March 31 2022, at 10:00 a.m. in United States Bankruptcy Court, The Gateway Building, 4th Floor Courtroom, Reading, PA 19601.**

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (610) 208-5040 to find out whether the hearing has been canceled because no one filed an answer.

Date: 3/9/2022

Attorney for Movant

/s/ Kevin K. Kercher
**Kevin K. Kercher, Esquire
881 Third Street, Suite #C-2
Whitehall, PA 18052
(610) 264-4120 phone
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